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Draft Environmental Impact Report (Draft EIR) for 6433 La Tuna Canyon Rd., (ENV-2007-3083)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Final EIR. In the project description, the lead agency proposes to build 229 single family homes on a 58.32 acres.

SCAQMD staff was unable to verify the regional and localized construction and operational emissions. Table IV-1 and Table IV-7– Estimated Mass Daily Construction Emissions calculations are inconsistent with– Appendix G – DKA Planning 2015. Appendix G only provides an annual summary and does not include any daily calculations. Furthermore, the lead agency indicates that CalEEMod 2013.2.2 was used to estimate construction and operational emission; however, Appendix G calculations were performed using CalEEMod 2011.1.1. Therefore, SCAQMD staff recommends that the lead agency conduct an air quality analysis using CalEEMOD 2013.2.2, which is the current version, and provide all the annual and daily reports to support the significance determination in the Draft EIR.

In Table IV-1 – Estimated Mass Daily Construction Emissions – Grading emissions exceed the regional significance threshold; however, the lead agency states that the regional threshold was not exceeded. For example, regional emissions of NOx are the sum of grading on-site emissions (75 lbs/day) and off-site emissions (66 lbs/day). Therefore, the total regional emissions (141 lbs/day) are greater than the regional significance threshold (100 lbs/day). Since grading impacts will exceed the regional significance threshold for NOx, impacts are significant and SCAQMD staff recommends additional NOx mitigation measures to reduce the impacts. Please see the attachment for more information.

In the Draft EIR, the lead agency notes that the proposed residences will be sited near the Route 210 freeway. These residences would be approximately 150 feet north of the freeway[1], of which Route 210 has an average daily traffic volume of 124,000 vehicles, which includes 10,400 diesel trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. The SCAQMD staff recommends that the lead agency prepare a mobile source health risk assessment to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic. The SCAQMD's recommended methodology can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc

[1] Aerial map inspection.

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, the California Air Resources Board recommended in 2005 avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.[2] Since the time of that study, additional research has continued to build the case that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.[3]

While the health science behind recommendations against placing new homes close to freeways is clear, SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sounds walls, vegetation barriers, etc. However, because of the potential health risks involved it is critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

Limits to Enhanced Filtration Units

The lead agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters[4] similar to those proposed for this project, costs were expected to range from $120 to $240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

The SCAQMD staff is available to work with the lead agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final EIR associated with this project.

Sincerely,

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[2] California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: http://www.arb.ca.gov/ch/landuse.htm

[3] See Chapter 9 of the 2012 AQMP for further information Accessed at: http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf

[4] This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 6 or better filters. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0 .

Additional Construction Mitigation Measures (NOx)

Based on a review of the Draft EIR, the lead agency determined that with mitigation measures, the proposed project will not result in significant regional air quality impacts during construction. SCAQMD staff recommends the following additional mitigation measures be incorporated into the proposed project and Final EIR to further reduce project impacts in addition to the measures included in the Draft EIR.

- All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Alternatively, the lead agency could rely on the Green Construction Policy used by LA County Metro or the ports of Los Angeles/Long Beach. These policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met.

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.